

1 GRIFFITH H. HAYES, ESQ.
Nevada Bar No. 7374
2 ALICIA A. HAGERMAN, ESQ.
Nevada Bar No. 10891
3 **LITCHFIELD CAVO LLP**
3993 Howard Hughes Parkway, Suite 100
4 Las Vegas, Nevada 89169
Telephone: (702) 949-3100
5 Facsimile: (702) 916-1776
Hayes@LitchfieldCavo.com
6 Hagermand@LitchfieldCavo.com

7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA – NORTHERN DIVISION**

10 THE CINCINNATI SPECIALTY
11 UNDERWRITERS INSURANCE COMPANY

12 Plaintiff.

13 v.

14 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock (81);
15 LYNN LLOYD, individually; AND TRACY
TURNBOW (Interested Party)

16 Defendants.

17 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock; and
18 BARBARA LYNN LLOYD,

19 Counterclaimants,

20 v.

21 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY;
22 BEEHIVE INSURANCE AGENCY, INC., a
Utah corporation,

23 Counterdefendants.

24 BEEHIVE INSURANCE AGENCY, INC.

25 Third-Party Plaintiffs

26 v.

27 MOORE CLEMENS & CO., INC., a Virginia
Corporation, and DOES I-X, inclusive

28 Third-Party Defendants.

CASE NO.: 3:20-cv-00272-MMD-WGC

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

1 AMERICAN RELIABLE INSURANCE
2 COMPANY

3 Intervenor

4 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff/Counterdefendant,
5 THE CINCINNATI SPECIALTY UNDERWRITERS INSURANCE COMPANY, by and through its
6 attorneys of record, the law firm of LITCHFIELD CAVO LLP, Defendants/Counterclaimants RED
7 ROCK HOUNDS, by and through its attorneys of record, the law firm of Maupin Cox & LeGoy,
8 Counterdefendant/Third-Party Plaintiff, BEEHIVE INSURANCE dba CERTIFIED INSURANCE
9 SERVICES, by and through its attorneys of record, the law firm of Erickson, Thorpe & Swainston,
10 Ltd., Third-Party Defendant MOORE CLEMENS & CO., by and through its attorneys of record, the
11 law firm of Lewis Brisbois Bisgaard & Smith LLP, and Intervener AMERICAN RELIABLE
12 INSURANCE COMPANY, by and through its attorneys, the law firm of Resnick & Louis, P.C.,
13 Defendant/Interested Party, TRACY TURNBOW, by and through her attorneys of record, the law
14 firm of Coulter Harsh Law, and BARBARA LYNN LLOYD, by and through her attorneys of record,
15 the law firm of Alling & Jillson, Ltd., (collectively "Parties"), that pursuant to Fed. R. Civ. P.
16 41(a)(1)(A)(ii), that the Complaint, Counterclaim and Third-Party Complaint filed in this case and
17 each and every cause of action therein, shall be dismissed with prejudice, with each party to bear its
18 own attorney's fees and costs.

19 **IT IS SO STIPULATED.**

20 Dated: May 13, 2021

21 **LITCHFIELD CAVO LLP**

22 By: /s/ Alicia A. Hagerman, Esq.
23 Griffith H. Hayes, Esq.
24 Nevada Bar No. 7374
25 Alica A. Hagerman, Esq.
26 Nevada Bar No. 10891
27 3993 Howard Hughes Parkway, Suite 100
28 Las Vegas, Nevada 89169
T: 702-949-3100/F: 702-916-1779
Hayes@LitchfieldCavo.com
Hagerman@LitchfieldCavo.com
Attorneys for Plaintiff

1 Dated: May 13, 2021

MAUPIN COX & LEGOY

2 By: /s/ Rick R. Hsu, Esq.
Rick R. Hsu, Esq.
3 Nevada Bar No. 5374
4 4785 Caughlin Parkway
P.O. Box 30000
5 Reno, NV 89509
T: 775-827-2000
rhsu@mcllawfirm.com
6 *Attorneys for Defendant/Counterclaimant Red*
7 *Rock Hounds*

8 Dated: May 13, 2021

COULTER HARSH LAW

9 By: /s/ Curtis B. Coulter, Esq.
Curtis B. Coulter, Esq.
10 Nevada Bar No. 3034
403 Hill Street
11 Reno, Nevada 89501
T: 775-324-3380
curtis@coulterharshlaw.com
12 *Attorneys for Defendant and Interested Party*
13 *Tracy Turnbow*

14 Dated: May 14, 2021

ERICKSON THORPE & SWAINSTON, LTD.

15 By: /s/ John C. Boyden, Esq.
John C. Boyden, Esq.
16 Nevada Bar No. 3917
99 W. Arroyo Street
17 PO Box 3559
Reno, Nevada 89505
18 T: 775-786-3930
jboyden@etsreno.com
19 *Attorneys for Counterdefendant and Third-*
20 *Party Plaintiff Beehive Insurance Agency*

21 Dated: May 13, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP

22 By: /s/ Alice K. Herbolsheimer, Esq.
Alice K. Herbolsheimer, Esq.
23 Nevada Bar No. 6389
Jack Angaran, Esq.
24 Nevada Bar No. 711
5555 Kietzke Lane, Site 200
25 Reno, Nevada 89511
T: 775-827-6440
jack.angaran@lewisbrisbois.com
26 alice.herbolsheimer@lewisbrisbois.com
27 *Attorneys for Third-Party Defendant Moore,*
28 *Clemens & Co., Inc.*

1 Dated: May 14, 2021

RESNICK & LOUIS, P.C.

2 By: /s/ Andrew Kurpanek, Esq.
3 Prescott Jones, Esq.
4 Nevada Bar No. 11617
5 8925 West Russell Road, Suite 220
6 Las Vegas, NV 89148-2540
7 pjones@rlattorneys.com

8 Andrew Kurpanek, Esq. (*Pro Hac Vice*)
9 Resnick & Louis, P.C.
10 8111 East Indian Bend Rd.
11 Scottsdale, AZ 85250
12 akurpanek@rlattorneys.com
13 *Attorneys for Intervenor American Reliable*
14 *Insurance Company*

15 Dated: May 13, 2021

ALLING & JILLSON, LTD.

16 By: /s/ Richard J. McGuffin, Esq.
17 Richard J. McGuffin, Esq.
18 Nevada Bar No.: 12819
19 276 Kingsbury Grade, Suite 2000
20 Post Office Box 3390
21 Lake Tahoe, NV 89449-3390
22 rmcguffin@ajattorneys.com
23 *Attorneys for Defendant Barbara Lynn Lloyd*

ORDER

24 Based upon the Stipulation of the parties, the Court having reviewed all pleadings and papers
25 on file herein and good cause appearing:

26 **IT IS HEREBY ORDERED** that that the Complaint, Counterclaim and Third-Party
27 Complaint filed in this case and each and every cause of action therein, shall be dismissed with
28 prejudice. The Parties will each bear their own fees and costs.

IT IS FURTHER ORDERED that this case is closed.

IT IS SO ORDERED.

DATED this 17th day of May, 2021.



UNITED STATES DISTRICT COURT JUDGE